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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,) No. CR 14-0170 CW
Plaintiff,)
v.)
TONI DENISE DANIELS,) AMENDED JOINT STIPULATION AND
Defendant.) [PROPOSED] ORDER RE REQUEST FOR
CONTINUANCE OF COMPETENCY HEARING
)
)
)

The above captioned matter is currently set for a competency hearing on June 7, 2016. The Parties jointly request that the competency hearing be vacated and the matter continued to July 5, 2016, at 2 p.m. for status.

After reviewing the relevant reports in this matter the parties have met and conferred over the process for conducting Ms. Daniels' upcoming competency hearing. The parties agreed to, and have, jointly requested additional medical records from Santa Rita Jail. The parties are still awaiting receipt of those records, and once they are received, the parties plan to jointly interview a doctor at Santa Rita Jail who has seen Ms. Daniels recently. The parties have also discussed having Ms. Daniels examined by a jointly-selected neuropsychologist after receiving and reviewing the additional records. A continuance

JOINT STIPULATION AND [PROPOSED] ORDER
RE CONTINUANCE OF COMPETENCY HEARING
CR-14-0170 CW

1 to July 5, 2016, should allow the parties to receive and review the additional records, to conduct the joint
2 interview, and to determine if it is necessary to have a neuropsychologist examine Ms. Daniels.

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5 **SO STIPULATED:**

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7 Dated: May 19, 2016

MELINDA HAAG
United States Attorney

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10 _____/s/
11 KESLIE STEWART
12 Assistant United States Attorney

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14 Dated: May 19, 2016

15 _____/s/
16 EDWIN PRATHER
17 Attorney for Defendant
18 TONI DENISE DANIELS

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20 **[PROPOSED] ORDER**

21 GOOD CAUSE APPEARING and per the parties' stipulation, the competency hearing currently
22 set for June 7, 2016, is continued to July 5, 2016, at 2:00 p.m. for status. Based on the parties'
23 stipulation and the nature of these proceedings and delay, time is excluded from the Speedy Trial Act
24 calculations until July 5, 2016, pursuant to 18 U.S.C. § 3161(h)(1)(A) (delay resulting from
25 proceedings to determine mental competency).

26 IT IS SO ORDERED.

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28 DATED: 5/20/16

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